

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
Greenbelt Division

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND
2015 FEB 26 PM 2:38

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Civil Action No. _____

TDC 15 CV 0554

* * * * *
LANHAM, LLLP
Plaintiff,
v.
SKANDARI VG, LLC
and
AHMAD MAHMOUD
Defendants.
* * * * *

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that the Defendants Skandari VG, LLC and Ahmad Mahmoud, by and through the undersigned counsel, pursuant to 28 U.S.C. §§ 1441, removes this action to this Court from the Circuit Court for Prince George's County, Maryland, in which court it has Case Number CAL14-10801, and in support thereof state as follows:

1. Plaintiff is a limited liability partnership with partners who are residents of Maryland and/or other states and, on information and belief, no partner thereof is a citizen of the Commonwealth of Virginia.

2. Defendant Skandari VG, LLC is an LLC whose member is a citizen of Virginia.

3. Defendant Ahmad Mahmoud is a citizen of Virginia.

4. Plaintiff being a citizen of Maryland, and Defendants being citizens of Virginia, and the amount in controversy being in

excess of \$75,000.00, this Court has jurisdiction over this action under 28 U.S.C. 1332.

5. No defendant properly joined and served being a citizen of Maryland, this action is removable under 28 U.S.C. § 1441(b).


6. Copies of all process, pleadings, and orders filed in the State Court are attached hereto.

7. This Notice of Removal is timely under 28 U.S.C. § 1446(b).

WHEREFORE, this action is hereby removed to the United States District Court for the District of Maryland.

Dated: February 25, 2015.

Respectfully submitted,



/s/ Daniel M. Press

Daniel M. Press, #07300

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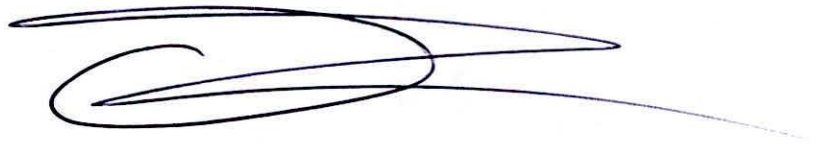
Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of February, 2015, I caused a copy of the foregoing Notice of Removal to be served by First Class Mail, postage prepaid, upon counsel for Plaintiff, addressed to:

Alyssa W. Chang, Esq.
19214 Forest Brook Road
Germantown, MD 20874

In addition, a copy hereof is being filed in the office of the Clerk of the Circuit Court for Prince George's County, Courthouse, Upper Marlboro MD 20772.

A handwritten signature in blue ink, appearing to be 'Daniel M. Press', with a large, stylized loop and a long horizontal stroke extending to the right.

/s/ Daniel M. Press
Daniel M. Press